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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

DREAM COLLECTIVE, INC., a  
California corporation;

Plaintiff,

vs.

MADEWELL, INC, a Delaware  
corporation; J. CREW, INC., a  
Delaware corporation; J. CREW  
GROUP, INC., a Delaware corporation;  
MAURICE MAX, INC. D/B/A LEE  
ANGEL., a New York Corporation; and  
DOES 1 through 10, inclusive,

Defendants.

Case No. 2:15-cv-07871 RSWL-JPR  
Hon. Ronald S. W. Lew

**EX PARTE APPLICATION TO  
EXTEND TIME TO RESPOND  
MORE THAN 30 DAYS PURSUANT  
TO STIPULATION**

**[Proposed Order]**

Complaint served: October 24, 2015  
Original response date: November 14,  
2015  
Current response date: December 14,  
2015  
New response date: January 13,  
2016

Plaintiff Dream Collective, Inc. hereby applies to the Court ex parte for an Order extending time for Defendants Madewell, Inc., J. Crew, Inc., J. Crew Group, Inc., and Maurice Max, Inc. D/B/A Lee Angel (collectively "Defendants") to file answers to the Complaint. The Parties have agreed that such an ex parte request will be made to this Court, pursuant to the terms of the stipulation below, in order for the Parties to continue settlement discussions. The Parties have previously stipulated to two extensions of time, totaling 30 days. This further extension is

1 necessary to allow additional time to prepare such pleading because the Parties  
2 have been and continue to discussing settlement.

3 The Parties therefore respectfully request that the Court grant Defendants an  
4 additional 30 days by which to file their answers to the Complaint.

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6 DATED: December 14, 2015 ERIKSON LAW GROUP

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9 By: /s/  
10 David Alden Erikson  
11 Attorneys for Plaintiff  
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**Stipulation To Extend Time for Defendants to File Answers**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for DREAM COLLECTIVE, INC., (“Plaintiff”) and MADEWELL, INC., J. CREW, INC., J. CREW GROUP, INC. and MAURICE MAX, INC. D/B/A LEE ANGEL (“Defendants”) that the deadline for Defendants to answer or otherwise respond to Plaintiff’s Complaint dated October 7th, 2015 is extended through to January 13th 2016

IT IS FURTHER STIPULATED AND AGREED that Defendants hereby waive all defenses relating to personal jurisdiction, including, without limitation, in connection with defects in service, subject matter jurisdiction and venue and agrees not to make any motion to dismiss or contest this action on the basis of any such waived defense.

IT IS FURTHER STIPULATED AND AGREED by and between the undersigned attorneys for Plaintiff and Defendants that PDF and facsimile signatures shall be deemed original signatures for all purposes under this Stipulation.

Dated: December 14, 2015  
Los Angeles, California

Dated: December 14, 2015  
New York, New York

**ERIKSON LAW GROUP**  
*Attorneys for Plaintiff*

**LAZARUS & LAZARUS, P.C.**  
*Attorneys for Defendant  
Maurice Max, Inc.*

By: /s/ David Erikson  
David A. Erikson  
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By: /s/ Harlan M. Lazarus  
Harlan M. Lazarus, Esq.  
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New York, NY 10016.  
(212) 889-7400

1 Dated: December 14, 2015  
2 New York, New York

3 **COWAN LIEBOWITZ & LATMAN, P.C.**  
4 *Attorneys for Defendant Madewell, Inc.,*  
5 *J. Crew, Inc. and J. Crew Group, Inc.*

6 By:           /s/ Thomas Kjellberg            
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